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*Special Counsel to Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

MILES & SHIRLEY FITERMAN
CHARITABLE FOUNDATION; and STEVEN
FITERMAN and VALERIE HERSCHMAN, in
their capacities as Trustees for the MILES &
SHIRLEY FITERMAN CHARITABLE
FOUNDATION,

Defendants.

Adv. Pro. No. 10-05067 (BRL)

NOTICE OF EXTENDED RESPONSE DUE DATE

On November 10, 2010, this Court entered the order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141].

Pursuant to the Order, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), may agree to one or more extensions of the response due date to the summons and complaint with the extensions totaling no more than 90 days without further Court order.

Defendants Miles & Shirley Fiterman Charitable Foundation; and Steven Fiterman and Valerie Herschman, in their capacities as Trustees for the Miles & Shirley Fiterman Charitable Foundation (collectively, the “Defendants”) in the above referenced adversary proceeding have requested an extension of time to move, answer or otherwise respond to the Complaint from May 13, 2011 up to and including June 13, 2011.

The Trustee consents to the Defendants' request to extend the response due date from May 13, 2011 up to and including June 13, 2011.

Dated: New York, New York
May 3, 2011

By: /s/ Howard L. Simon
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